

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	X	
	:	Chapter 11
	:	
ZEN JV, LLC, <i>et al.</i> , <sup>1</sup>	:	Case No. 25-11195 (JKS)
	:	
Debtors.	:	(Jointly Administered)
	:	
	:	<b>Obj. Deadline: November 5, 2025 at 4:00 p.m. (ET)</b>
	:	
	X	

**COVER SHEET FOR THIRD MONTHLY APPLICATION OF LATHAM & WATKINS  
LLP FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT  
OF EXPENSES INCURRED AS BANKRUPTCY COUNSEL FOR THE PERIOD FROM  
SEPTEMBER 1, 2025 THROUGH SEPTEMBER 30, 2025**

Name of applicant:	<u>Latham &amp; Watkins LLP</u>
Authorized to provide professional services to:	<u>Debtors and Debtors-in-Possession</u>
Date of retention:	<u>August 11, 2025, effective as of June 24, 2025</u>
Period for which compensation and reimbursement are sought:	<u>Sept. 1, 2025 through Sept. 30, 2025</u>
Amount of compensation sought as actual, reasonable, and necessary:	<u>\$88,021.50 (80% = \$70,417.20)</u>
Amount of expense reimbursement sought as actual, reasonable, and necessary:	<u>\$0.00</u>

This is a(n): X monthly    \_\_\_ interim    \_\_\_ final application

This monthly application includes **7.8** hours with a value of **\$8,616.00** incurred in connection with the preparation of fee applications.

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each debtor's federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions, LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors' address is 200 N LaSalle Street #900, Chicago, IL 60601.

## Prior Applications Filed:

<b>Docket No.</b>	<b>Date Filed</b>	<b>Period Covered</b>	<b>Fees</b>	<b>Expenses</b>	<b>CNO Filed</b>
313	08/25/2025	6/24/2025 – 7/31/2025	\$3,073,816.75	\$5,934.33	Docket No. 364 9/16/2025
359	09/15/2025	8/01/2025 – 8/31/2025	\$223,380.50	\$10,592.60	Docket No. 422 10/06/2025

**COMPENSATION BY PROFESSIONAL**

<b>Name of Professional</b>	<b>Position; Date of Hire; Year of Obtaining License to Practice</b>	<b>Hourly Billing Rate<sup>2</sup></b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Arthur, Candace M.	Partner. Joined firm in 2024. Member of New York Bar since 2010. Member of Restructuring Department.	\$2,095.00	7.40	\$15,503.00
Kaplan, Binyomin	Counsel. Joined firm in 2022. Member of New York Bar since 2001. Member of Corporate Department	\$1,980.00	2.60	\$5,148.00
Waller, Laura Marie D.	Counsel. Joined firm in 2020. Member of Illinois Bar since 2004. Member of Tax Department.	\$1,875.00	5.30	\$9,937.50
Lim, Christopher W.	Associate. Joined firm in 2017. England and Wales (Solicitor), 2019. Member of California Bar since 2021. Member of Corporate Department.	\$1,635.00	13.20	\$21,582.00
Gordon, Jonathan	Associate. Joined firm in 2020. Member of Illinois Bar since 2018. Member of Restructuring Department.	\$1,635.00	7.20	\$11,772.00
Savelski, Julian	Associate. Joined firm in 2022. Member of California Bar since 2022. Member of Corporate Department.	\$1,320.00	2.30	\$3,036.00
Han, Alice	Associate. Joined firm in 2024. Member of California Bar since 2024.	\$975.00	15.50	\$15,112.50
Tarrant, Christopher M.	Senior Paralegal. Joined firm in 2022.	\$650.00	4.20	\$2,730.00
Bajada-Bartlett, Jessica	Senior Paralegal. Joined firm in 2019.	\$605.00	2.60	\$1,573.00
Jaman, Ella	Paralegal. Joined firm in 2022.	\$525.00	3.10	\$1,627.50

**Grand Total**  
**Total Hours**  
**Blended Rate<sup>3</sup>**

**\$88,021.50**  
**63.40**  
**\$1,388.35**

<sup>2</sup> All non-working travel time has been billed at 50% of the normal hourly rate.

<sup>3</sup> The blended rate is calculated based on the hourly rates for all professionals and paraprofessionals.

**COMPENSATION BY PROJECT CATEGORY**

<b>Project Category<sup>4</sup></b>	<b>Total Hours</b>	<b>Total Fees</b>
Asset Disposition/Asset Sales	36.20	\$46,451.50
Case Administration (Docket, WIP and Calendar Updates)	3.10	\$1,627.50
Employee Matters (including Benefits/Pensions)	6.60	\$12,063.00
General Case Strategy (WIP Calls, Team and Client Calls)	0.80	\$1,308.00
Hearings	1.90	\$3,796.50
International / Foreign Matters	0.30	\$628.50
Meetings and Communications with Creditors	0.20	\$327.00
Plan and Disclosure Statement/Confirmation/Implementation/Plan Supplement	6.50	\$13,203.50
Retention/Fee Matters (L&W)	7.80	\$8,616.00
<b>Grand Total</b>	<b>63.40</b>	<b>\$88,021.50</b>

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<sup>4</sup> All non-working travel time has been billed at 50% of the normal hourly rate.

**EXPENSE SUMMARY**

Expense Category	Total Expenses
N/A	
<b>Total</b>	<b>\$0.00</b>

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In re:	:	Chapter 11
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ZEN JV, LLC, <i>et al.</i> , <sup>1</sup>	:	Case No. 25-11195 (JKS)
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Debtors.	:	(Jointly Administered)
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	:	<b>Objection Deadline:</b>
	:	<b>November 5, 2025 at 4:00 p.m. (ET)</b>
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**THIRD MONTHLY APPLICATION OF LATHAM & WATKINS LLP FOR  
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF  
EXPENSES INCURRED AS BANKRUPTCY COUNSEL FOR THE PERIOD FROM  
SEPTEMBER 1, 2025 THROUGH SEPTEMBER 30, 2025**

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), and the *Order Pursuant to 11 U.S.C. §§ 331, 330, and 105(a) and Fed. R. Bankr. P. 2016 (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, and (II) Granting Related Relief* [Docket No. 258] (the “**Interim Compensation Order**”), Latham & Watkins LLP (“**L&W**”) hereby files this application (the “**Application**”) seeking a monthly allowance with respect to the sum of \$88,021.50 (80% of which equals \$70,417.20) as compensation and \$0.00 as reimbursement of actual and necessary expenses, for a total of \$88,021.50 for the period from

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each debtor’s federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions, LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors’ address is 200 N LaSalle Street #900, Chicago, IL 60601.

September 1, 2025 through and including September 30, 2025 (the “**Compensation Period**”). In support of this Application, L&W respectfully represents as follows:

**Background**

1. On June 24, 2025 (the “**Petition Date**”), the Debtors each commenced with this Court a voluntary case under chapter 11 of the Bankruptcy Code (collectively, the “**Chapter 11 Cases**”). The Debtors are authorized to continue to operate their business and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. No trustee or examiner has been appointed in these Chapter 11 Cases. On July 2, 2025, the United States Trustee for the District of Delaware (the “**U.S. Trustee**”) appointed an official committee of unsecured creditors (the “**Creditors’ Committee**”) [Docket No. 65].

3. The Debtors’ chapter 11 cases are being jointly administered pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1.

4. Additional information regarding the Debtors’ business and capital structure and the circumstances leading to the commencement of these chapter 11 cases is set forth in the *Declaration of Michael Suhajda, Chief Financial Officer, in Support of Chapter 11 Petitions and First Day Pleadings* [Docket No. 36], filed on June 26, 2026, which is fully incorporated herein by reference.<sup>2</sup>

5. L&W was retained effective as of the Petition Date by this Court’s Order, dated August 11, 2025 [Docket No. 297] (the “**Retention Order**”). The Retention Order authorized L&W to be compensated on an hourly basis and to be reimbursed for actual and necessary out-of-pocket expenses.

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the First Day Declaration.

**Compensation Paid and Its Source**

6. All services for which L&W is requesting compensation were performed for or on behalf of the Debtors.

7. L&W has received no payment and no promises for payment from any source for services rendered or to be rendered in connection with the matters covered by this Application.

8. Pursuant to Bankruptcy Rule 2016(b), L&W has not shared, nor has L&W agreed to share, (a) any compensation it has received or may receive with another party or person other than with the partners, counsel, and associates of L&W, or (b) any compensation another party or person has received or may receive.

**Fee Statement**

9. The fee statement for the Compensation Period is attached hereto as Exhibit A. This statement contains daily time logs describing the time spent by each professional and paraprofessional for this period. To the best of L&W's knowledge, this Application complies with Sections 330 and 331 of the Bankruptcy Code, Local Rule 2016-2, all other applicable Bankruptcy Rules, the Guidelines adopted by the Office of the United States Trustee, and the Interim Compensation Order.

**Actual and Necessary Expenses**

10. L&W is not requesting the reimbursement of any expenses in this Application.

**Summary of Services by Project**

11. The actual, reasonable, and necessary services rendered by L&W during the Compensation Period can be grouped into the categories set forth below. These categories are generally described below, with a more detailed description of the services provided set forth on the attached Exhibit A. The professionals and paraprofessionals who rendered services relating to



each category are identified, along with the number of hours for each individual and the total compensation sought for each category, in Exhibit A attached hereto.

**A. Asset Disposition/Asset Sales**

**Fees: \$46,451.50                      Total Hours: 36.20**

12. This category includes time spent in connection with post-closing matters related to the Debtors' three sales of substantially all their assets, which sales closed on July 31, 2025. *See* Docket Nos. 266, 267, & 269. Specifically, L&W attorneys spent time analyzing and negotiating issues related to IP assignments, among other things.

**B. Case Administration (Docket, WIP and Calendar Updates)**

**Fees: \$1,627.50                      Total Hours: 3.10**

13. This category includes time spent in connection with, among other things, coordinating the administration of these Chapter 11 Cases by reviewing the docket of the Chapter 11 Cases and calendaring important dates.

**C. Employee Matters (including Benefits/Pensions)**

**Fees: \$12,063.00                      Total Hours: 6.60**

14. This category includes time spent on matters relating to the Debtors' employees, including preparing an independent contractor agreement to help facilitate the orderly winddown of the Debtors' estates.

**D. General Case Strategy (WIP Calls, Team and Client Calls)**

**Fees: \$1,308.00                      Total Hours: 0.80**

15. This category includes time spent preparing for and attending scheduled work-in-progress meetings among L&W professionals and the Debtors' other advisors to analyze and address ongoing issues and workstreams in these Chapter 11 Cases.

**E. Hearings**

**Fees: \$3,796.50**

**Total Hours: 1.90**

16. This category includes time spent on matters relating to the preparation for and participation in the Debtors' disclosure statement hearing.

**F. International / Foreign Matters**

**Fees: \$628.50**

**Total Hours: 0.30**

17. This category includes time spent relating to the impact and interdependencies related to the winddown of the Debtors' non-U.S. affiliates and the Debtors' relationship therewith.

**G. Meetings and Communications with Creditors**

**Fees: \$327.00**

**Total Hours: 0.20**

18. This category includes time spent engaging with certain creditors and addressing their inquiries related to, among other things, the various developments occurring in these Chapter 11 Cases and related matters.

**H. Plan and Disclosure Statement / Confirmation /  
Implementation / Plan Supplement**

**Fees: \$13,203.50**

**Total Hours: 6.50**

19. This category includes time spent in connection with the Debtors' chapter 11 plan, including (a) reviewing and revising the combined disclosure statement and plan, (b) negotiating with various stakeholders in connection with plan treatment, and (c) reviewing and revising the Debtors' chapter 11 plan and related materials.

**I. Retention/Fee Matters (L&W)**

**Fees: \$8,616.00**

**Total Hours: 7.80**

20. This category includes time spent reviewing and revising L&W's invoice and fee statement for the month of August 2025 for privilege, confidentiality, and compliance with the U.S. Trustee's fee guidelines, as well as preparing L&W's first interim fee application.

**Valuation of Services**

21. Attorneys and paraprofessionals of L&W have expended a total of 63.40 hours in connection with this matter during the Compensation Period. The nature of the work performed by these persons is fully set forth in Exhibit A attached hereto. The hourly rates set forth in Exhibit A are L&W's normal hourly rates for work of this character. The reasonable value of the services rendered by L&W to the Debtors during the Compensation Period is \$88,021.50.

22. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by L&W is fair and reasonable given (a) the complexity of these cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services in other cases under this title. Moreover, L&W has reviewed the requirements of Local Rule 2016-2 and believes that this Application complies with that Local Rule.

WHEREFORE, L&W respectfully requests that the Court authorize that, for the Compensation Period, an allowance be made to L&W pursuant to the terms of the Interim Compensation Order with respect to the sum of \$88,021.50 as compensation for necessary professional services rendered (80% of which equals \$70,417.20), and the sum of \$0.00 as reimbursement of actual necessary costs and expenses, for a total of \$88,021.50, and that the sum

of \$70,417.20 (80% of fees and 100% of expenses) be authorized for payment and for such other and further relief as this Court may deem just and proper.

Dated: October 15, 2025  
Wilmington, Delaware

Respectfully Submitted,

/s/ Candace M. Arthur

**LATHAM & WATKINS LLP**

Ray C. Schrock (admitted *pro hac vice*)

Candace M. Arthur (admitted *pro hac vice*)

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*Counsel for the Debtors and Debtors in Possession*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	X	
	:	Chapter 11
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ZEN JV, LLC, <i>et al.</i> , <sup>1</sup>	:	Case No. 25-11195 (JKS)
	:	
Debtors.	:	(Jointly Administered)
	:	
	X	

**DECLARATION OF CANDACE M. ARTHUR**

1. I am a partner with the applicant firm, Latham & Watkins LLP (the “**Firm**”), and have been admitted to the bar of the State of New York since 2010. I make this certification in accordance with Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”).

2. I am familiar with the work performed on behalf of the Debtors<sup>2</sup> by the Firm’s professionals. I have reviewed the *Third Monthly Application of Latham & Watkins LLP for Compensation for Services Rendered and for Reimbursement of Expenses Incurred as Bankruptcy Counsel to the Debtors for the Period from September 1, 2025 Through September 30, 2025* (the “**Application**”), and the facts set forth therein are true and correct to the best of my knowledge, information, and belief.

3. Moreover, I have reviewed Local Rule 2016-2 and, to the best of my knowledge, information, and belief formed upon the basis of my participation in these cases, as well as after

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Application (as defined herein).

reasonable inquiry, the facts set forth in the Application materially comply with the provisions of the Local Rules, the Bankruptcy Code, and this Court's orders.

Date: October 15, 2025  
New York, New York

/s/ Candace M. Arthur  
Candace M. Arthur